

**United States Court of Appeals  
for the District of Columbia Circuit**

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**No. 24-1113**

(and Consolidated Cases 24-1130 & 24-1183)

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TIKTOK INC. and BYTEDANCE LTD.,

*Petitioners,*

v.

MERRICK B. GARLAND, in his official capacity as  
Attorney General of the United States,

*Respondent.*

*(For Continuation of Caption See Inside Cover)*

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*On Petition for Review of Constitutionality of the Protecting  
Americans from Foreign Adversary Controlled Applications Act*

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**NOTICE OF INTENT TO PARTICIPATE AS *AMICI CURIAE* FOR  
CAMPAIGN FOR UYGHURS, THE COMMITTEE FOR FREEDOM IN  
HONG KONG, HONG KONG WATCH, INTERNATIONAL CAMPAIGN  
FOR TIBET, UYGHUR AMERICAN ASSOCIATION, UYGHUR HUMAN  
RIGHTS PROJECT, AND VICTIMS OF COMMUNISM MEMORIAL  
FOUNDATION IN SUPPORT OF RESPONDENT**

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August 8, 2024

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BRIAN FIREBAUGH, *et al.*,

*Petitioners,*

v.

MERRICK B. GARLAND, in his official capacity as  
Attorney General of the United States,

*Respondent.*

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BASED POLITICS INC.,

*Petitioner,*

v.

MERRICK B. GARLAND, in his official capacity as  
Attorney General of the United States,

*Respondent.*

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**NOTICE OF INTENT TO FILE AMICUS BRIEF**

Pursuant to Federal Rule of Appellate Procedure 29(a) and Circuit Rule 29(b), the Campaign for Uyghurs, the Committee for Freedom in Hong Kong, Hong Kong Watch, International Campaign for Tibet, Uyghur American Association, Uyghur Human Rights Project and Victims of Communism (together “*amici*”) represents that they intend to participate in this case as *Amici Curiae* in support of Respondent. Petitioners and Respondent have consented to the filing of this amicus brief.

Dated: August 8, 2024

Respectfully submitted,

/s/ Joel L. Thayer

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**CORPORATE DISCLOSURE STATEMENT**

Pursuant to Federal Rule of Appellate Procedure 26.1 and D.C. Circuit Rule 26.1, amici state that they have no parent corporations and that no publicly held company owns ten percent (10%) or more of any amici's organizations.

Dated: August 8, 2024

Respectfully submitted,

/s/ Joel L. Thayer

Joel L. Thayer

*Attorney for Amici Curiae*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 8, 2024, I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the District of Columbia Circuit by using the CM/ECF system, which will serve all parties automatically.

Dated: August 8, 2024

Respectfully submitted,

/s/ Joel L. Thayer  
Joel L. Thayer

*Attorney for Amici Curiae*